IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS TYLER DIVISION

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§	Civil Action No. 6:10-cv-329-LED
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DEFENDANT jWIN ELECTRONICS CORP.'S ORIGINAL ANSWER TO FIRST AMENDED COMPLAINT

Defendant jWIN Electronics, Corp., files this answer to Plaintiff's First Amended Complaint:

<u>RESPONSE TO PLAINTIFF'S ALLEGATIONS</u>¹

- jWIN denies the allegations and conclusions of this paragraph for lack of knowledge.
- jWIN denies the allegations and conclusions of this paragraph for lack of knowledge.
- jWIN denies the allegations and conclusions of this paragraph for lack of knowledge.
- 4. jWIN denies the allegations and conclusions of this paragraph for lack of knowledge.
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¹ Each Paragraph number in this section corresponds to the paragraph numbers in Plaintiff's First Amended Complaint.

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Prayer for Relief: jWIN denies that Plaintiff is entitled to the relief prayed for in its petition.

AFFIRMATIVE DEFENSES

227. jWIN denies that Plaintiff is the owner of the patent and denies that it has standing to sue.

- 228. jWIN denies that any patent such as described by Plaintiff is valid and applicable to any devise sold by jWIN.
- 229. jWIN requests a trial by jury.

PRAYER

Defendant jWIN Electronics Corp., prays that Plaintiff recover nothing and that it have its court costs and expenses as allowed by law.

September 17, 2010

Respectfully submitted,

WERNER AYERS, L.L.P.

By: ____Philip Werner/s/

Philip A. Werner Texas Bar No. 21190200 2000 West Loop South, Suite 1550 Houston, Texas 77027 (713) 626-2233 (713) 626-9708 (Fax)

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I certify that all counsel or record who are deemed to have consented to electronic service are being served a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3). Other Defendants will be served in accordance with the Federal Rules of Civil Procedure.

September 17, 2010

<u>Philip Werner /s/</u> Philip Werner